## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

: Chapter 13 In re:

: Case No. 19-11425 (MDC)

Khalil Shaheed, : Hearing Date: October 14, 2020 at 10:30 a.m.

Objections Due: September 28, 2020

Debtor.

## NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING

Police and Fire Federal Credit Union ("PFFCU") has filed a Motion for Relief from the Automatic Stay to Exercise Rights to Obtain Possession of Vehicle (the "Motion") with the Court.

- 1. <u>Your rights may be affected</u>. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)
- 2. If you do not want the Court to grant the relief sought in the Motion or if you want the Court to consider your views on the Motion, then on or before September 28, 2020, you or your attorney must file a response to the Motion.
- 3. A hearing on the Motion is scheduled to be held before the Honorable Magdeline D. Coleman, on October 14, 2020, at 10:30 a.m. in Courtroom #2, at the United States Bankruptcy Court, 900 Market Street, Philadelphia, Pennsylvania, 19107. Unless the court orders otherwise, the hearing on this contested matter will be an evidentiary hearing.
- 4. **If you do not file a response to the Motion**, the court may cancel the hearing and enter an order granting the relief requested in the Motion.
- 5. You may contact the Bankruptcy Clerk's Office at 215-408-2800 to find out whether the hearing has been canceled because no one filed a Response.
- 6. If a copy of the Motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney whose name and address is listed on the next page of the Notice.

## **Filing Instructions**

- 7. If you are required to file documents electronically by Local Bankruptcy Rule 5005-1, you must file your response electronically.
- 8. **If you are not required to file electronically,** you must file a response at Clerk's Office, 900 Market Street, Suite 400, Philadelphia, Pennsylvania 19107.
- 9. **If you mail your response** to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated in Paragraph 2 on the previous page of this Notice.
- 10. On the same day you file or mail your Response to the Motion, you must mail or deliver a copy of the Response to the movant's attorney:

Anne M. Aaronson, Esquire Dilworth Paxson LLP 1500 Market St., Suite 3500E Philadelphia, PA 19102 Telephone: (215) 575-7000

Facsimile: (215) 575-7200 aaaronson@dilworthlaw.com

## DILWORTH PAXSON LLP

/s/ Anne M. Aaronson

Anne M. Aaronson 1500 Market St., Suite 3500E Philadelphia, PA 19102 (215) 575-7100

Dated: September 14, 2020 Attorneys for Police and Fire Federal Credit Union